

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	
	§	CRIMINAL NO. 4:24-CR-580
[1] Francisco Jaramillo-Valdovinos, <i>et al.</i>	§	
	§	
<i>Defendants.</i>	§	

**FOURTH JOINT STATUS REPORT ON DISCOVERY**

Pursuant to the Court's order dated February 7, 2025 (Docket No. 233), this joint status report is filed by the United States and Defendants [9] Nabeel Iqbal, [11] Yossio Resendez, [12] Lorena Araquistain, [14] Victor Garcia-Cisneros, [16] Cliserio Najera-Valenzuela, [17] Marcos Pineda-Mendoza, [19] Abel Delgado-Rojas, [20] Rogelio Zuniga-Reyes, [21] Yonatan Duarte-Garcia, [24] Norberto Coronado, [25] Mayco Jaimes, [26] Marcos Antonio Zapata, [28] Kalle Robert Cort, [29] Jose Hernandez-Olvera, [31] Enio Gonzalez-Barreto, [32] Brandy Nikoll Meadows, [33] Othoniel Gonzalez II, and [34] Cristian Alexis Garza, by and through their respective counsel.

**Procedural Background**

On November 7, 2024, a sealed indictment was returned in this matter, charging 34 defendants in Count One with Conspiracy to Launder Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h). Several defendants were named on additional counts of Laundering Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2, and/or Possession with Intent to Distribute Cocaine/Heroin/Alprazolam, in violation of 21 U.S.C. § 841(a) and (b).

Beginning on or about January 23, 2025, all but 11 defendants<sup>1</sup> were arrested on the pending charges and either retained or were appointed counsel.

The Court designated the case complex on February 7, 2025, and vacated all dates in the scheduling order. The Court ordered the parties to submit a joint status report on discovery every 90 days, beginning in May 2025. Doc. No. 233. The parties filed the First Status Report on May 9, 2025, Doc. No. 284; the Second Status Report on August 7, 2025, Doc. No. 315; and the Third Status Report on November 5, 2025, Doc. No. 373.

### **Status of Discovery**

To facilitate the dissemination of discovery to court-appointed counsel in this complex, multi-defendant case, the Court appointed Russell M. Aoki of Aoki Law PLLC as the Coordinating Discovery Attorney on February 26, 2025. Docket No. 257. He has agreed to provide the discovery to retained counsel if they provide him with blank drives.<sup>2</sup>

To date, Mr. Aoki has received four rounds of general discovery from the United States, which he has prepared for dissemination to defense counsel. All court-appointed and retained defense counsel received the first round of discovery.

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<sup>1</sup> The 11 fugitive defendants are: [1] Francisco Jaramillo-Valdovinos; [2] Angelberto Quezada-Mejia; [3] FNU LNU a/k/a “Horacio;” [4] Alejandro Olmeda-Rodriguez; [5] Joel Quezada-Reyes; [6] David Mejia-Quezada; [7] Jaime Hugo Sanchez; [8] Diego Gonzalez-Rosales; [13] Aguileo Duarte-Chavez; [15] Primo Hernandez-Garcia; and [18] Juan Contreras-Morales.

<sup>2</sup> The following defendants retained counsel: [9] Nabeel Iqbal, [10] Asad Kesaria, [12] Lorena Araquistain, [21] Yonatan Duarte-Garcia, [22] Diego Macentyre-Rodriguez, [23] Andres Ramirez-Duarte, [24] Norberto Coronado-Mata, [28] Kalle Robert Cort, [30] Jesus Horacio Garza, [31] Enio Gonzalez-Barreto, [33] Othoniel Gonzalez II, and [34] Cristian Alexis Garza.

Mr. Aoki's firm shipped supplemental rounds of discovery to court-appointed counsel on the following dates:

- Second round on October 1, 2025
- Third round on November 5, 2025<sup>3</sup>
- Fourth round on December 17-18, 2025

Retained counsel were invited to send drives to Mr. Aoki's firm for all rounds of discovery. All retained counsel received the first round of production. Retained counsel for four defendants received the second and third rounds of production. Retained counsel for one defendant received the fourth round of production.

In addition to the general discovery disseminated through Mr. Aoki, the Government made a defendant-specific production, consisting of 1.6 terabytes of data, to [9] Nabeel Iqbal on January 9, 2026. This was a reproduction of prior discovery due to technical issues identified by counsel for Mr. Iqbal, which the Government is attempting to address with counsel for Mr. Iqbal.

Finally, the Government is preparing to submit a fifth round of general discovery to Mr. Aoki, which is estimated to consist of no more than 25 GB of data. Once received and processed, Mr. Aoki will make the discovery available to defense counsel.

### **Conclusion**

The discovery process in this complex, multi-defendant case is drawing to a close. Once all discovery has been received, the defense will require time to review the discovery, to consider

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<sup>3</sup> Substituted CJA Counsel J.A. Salinas received the first three rounds of discovery on November 19, 2025.

any plea offers from the Government, to decide whether to file any pretrial motions, and/or to prepare for trial.

The Government and all defense counsel listed in the Certificate of Conference below agree that no trial settings or trial-related deadlines should be imposed at this time. The parties will update the Court on the status of discovery no later than **May 4, 2026**.<sup>4</sup>

Respectfully submitted,

NICHOLAS J. GANJEI  
United States Attorney

By: /s/ Stephanie Bauman  
Sherin S. Daniel  
Stephanie Bauman  
Assistant United States Attorneys  
U.S. Attorney's Office, S.D. Texas  
Tel: (713) 567-9000

**CERTIFICATE OF CONFERENCE**

I hereby certify that I attempted to confer with all defense counsel of record in this case, with the exception of counsel for defendants who have been sentenced or entered a plea of guilty. The counsel listed below have each approved this status report and authorized the filing of the status report as joint.

Sina Zadeh  
Counsel for [9] Nabeel Iqbal

J. A. Salinas  
Counsel for [14] Victor Garcia-Cisneros

Kimberly McTorry  
Counsel for [11] Yossio Resendez

Ali Fazel  
Counsel for [16] Cliserio Najera-Valenzuela

Stephen St. Martin and Matthew Leeper  
Counsel for [12] Lorena Araquistain

David Adler  
Counsel for [17] Marcos Pineda-Mendoza

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<sup>4</sup> If in a position to do so, the parties will file the next status report before the date listed.

Javier Martinez  
Counsel for [19] Abel Delgado-Rojas

Mark Diaz  
Counsel for [20] Rogelio Zuniga-Reyes

Erin Epley  
Counsel for [21] Yonatan Duarte-Garcia

Eric Reed  
Counsel for [24] Norberto Coronado

Molly Bagshaw  
Counsel for [25] Mayco Jaimes

Adrian Almaguer  
Counsel for [26] Marcos Antonio Zapata

Billy Morian and Reagen Thomas  
Counsel for [28] Kalle Robert Cort

Anuj Shah  
Counsel for [29] Jose Hernandez-Olvera

Mario Madrid  
Counsel for [31] Enio Gonzalez-Barreto

Paul Morgan  
Counsel for [32] Brandy Meadows

Chip Lewis  
Counsel for [33] Othoniel Gonzalez II

Wade Smith  
Counsel for [34] Cristian Alexis Garza

/s/ Stephanie Bauman  
Stephanie Bauman  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing will be served on all counsel of record upon filing with ECF.

/s/ Stephanie Bauman  
Stephanie Bauman  
Assistant United States Attorney